



FERNALD/ANL-W PROGRAM REVIEWS

A TALE OF TWO CITIES

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FERNALD/ANL-W PROGRAM REVIEWS

BACKGROUND

- ♦ **PAAA Program Reviews, an EH-Enforcement initiative, started in 1999**
- ♦ **Objectives: encourage effective programs, promote uniformity, provide mechanism for lessons-learned**
- ♦ **Fernald review conducted 11/99; ANL-W review conducted 9/99 with follow-up review 9/00**

FERNALD PROGRAM REVIEW

STRENGTHS--

- ♦ **Viewed as an effective overall program**
- ♦ **Positive program elements:**
 - **Broad scope of sources reviewed for potential noncompliances**
 - **Use of qualified SMEs for screening**
 - **PAAA Annual Report--provides management a perspective**

FERNALD PROGRAM REVIEW

STRENGTHS (Continued)

- ◆ **Noncompliance database allows for easy searching, trending**
- ◆ **QA Manager effectively functioning as PAAA Coordinator**
- ◆ **Effective 10 CFR 835 triennial review system-- covers all areas**

FERNALD PROGRAM REVIEW

Strengths (Continued)

- ♦ **Strong corrective action closure and validation process by both Project Level and QA**
- ♦ **Strong positive support from senior management**

FERNALD PROGRAM REVIEW

DEFICIENCIES

♦ Procedural Weaknesses:

- Language implies event must involve movement/handling of RAM to be in PAAA space, must have potential for grave harm to report to NTS**
- No detail/guidance on trending for repetitive or programmatic issues**

FERNALD PROGRAM REVIEW

Deficiencies (Continued)

- ♦ **Programmatic/roll-up NTS reports being generated, however, root cause for such reports not consistently performed**
- ♦ **Above deficiencies not significantly impacting performance; identification, screening and reporting effectively being done**

FERNALD PROGRAM REVIEW

DOE-FEMP OVERSIGHT

- ♦ **DOE-FEMP performs day to day oversight of contractor PAAA Program (review of draft NTS reports, draft CA plans, discussion of events)**
- ♦ **DOE-FEMP, with DOE-OH support, has also conducted annual appraisals of contractor PAAA Program since 1997**

FERNALD PROGRAM REVIEW

DOE-FEMP OVERSIGHT (Continued)

- ◆ **Team approach--provides in-depth review of contractor PAAA activities**
- ◆ **Each review follows-up issues from previous; result is continuous improvement of program**

FERNALD PROGRAM REVIEW

DOE-FEMP OVERSIGHT (Continued)

- ◆ **DOE-FEMP 1999 appraisal completed one month prior to EH-Enforcement review**
- ◆ **EH-Enforcement review effectively validated FEMP's review; identified same findings. Enforcement report commented on similarities to FEMP's review.**
- ◆ **Net result - Stronger message to contractor; demonstration of consensus between DOE HQ and Field**

ANL-W PAAA PROGRAM REVIEW

- ♦ **Multiple deficiencies noted; no strengths reported**
- ♦ **Limited information sources available to Coordinator; consequent emphasis almost entirely on events with no noncompliances reported as a result of assessments**
- ♦ **PAAA procedure did not describe screening process, training requirements, closure/verification of corrective actions; required only an annual review for trends.**

ANL-W PAAA PROGRAM REVIEW

ANL-W Deficiencies (Continued)

- ◆ **Majority of processes used for tracking/disposition of quality problems not formal--no procedure, utilized on optional basis**
- ◆ **Contractor utilizing multiple division-specific systems to track assessment findings; no capability for overall tracking/trending. Multiple findings never entered on systems.**

ANL-W PAAA PROGRAM REVIEW

Deficiencies (Continued)

- ♦ **Cause determinations not performed for significant, reportable noncompliances**
- ♦ **Significant percentage of corrective actions overdue**

ANL-W PAAA PROGRAM REVIEW

Follow-up Review

- ♦ **Follow-up review performed one year later
(September 2000)**
- ♦ **Little progress noted--efforts initiated, not
effectively implemented**

ANL-W PAAA PROGRAM REVIEW

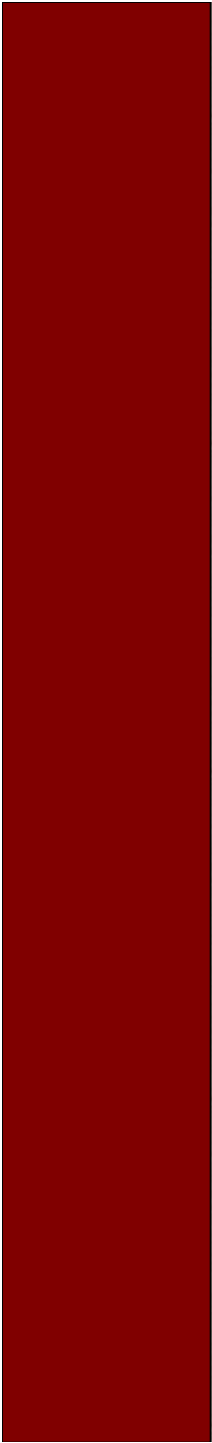
Summary

- ◆ **PAAA Coordinator oversight activities can have a significant impact on contractor program adequacy.**
- ◆ **Periodic external reviews can provide program calibration and can complement/enhance significance of internal reviews.**

FERNALD/ANL-W PROGRAM REVIEWS

Reason for Differences Between Programs

- ♦ **Need contractor program champion**
- ♦ **Need recognition of program importance by senior contractor and DOE management**
- ♦ **May need enforcement action**



DOE PRICE-ANDERSON COORDINATORS TRAINING

OPEN DISCUSSION

November 29, 2000